

MAYOR MARY ANN COURVILLE
VICE MAYOR GIL VEGA
COUNCILMEMBER LOREN FERRERO



COUNCILMEMBER JILL ORR
COUNCILMEMBER DAN SUPRIANO
CITY TREASURER DAVID DINGMAN

November 7, 2003

Mr. Paul Dabbs
Statewide Planning Branch
California Department of Water Resources
P.O. Box 942834
Sacramento, CA 94236-0001

Re: California Water Plan Update 2003

Dear Mr. Dabbs:

The City of Dixon, California, believes important components of California's water future include water conservation and wastewater reclamation. From the City's perspective, the State currently does not have a comprehensive, integrated plan related to the implementation of water conservation and reclamation.

For example, when the City improves water conservation, wastewater contaminant concentrations (such as salts and metals) naturally increase. The Regional Board (Region 5) wants these concentrations reduced and suggests the means to accomplish this is by diluting the wastewater with non-wastewater. If we are to commit non-wastewater resources for the purposes of diluting wastewater, then what was the purpose of water conservation? In this regard, water conservation appears to make sense only in cities with wastewater discharges to saline waters where salts, and possibly metals, may be less critical water quality issues.

Regarding reclamation, State laws and policies are sufficiently vague and/or disregarded by regulators to a point where reclamation is a liability to our community, not an asset. For example, Water Code Section 13523.5 states:

"A regional board may not deny issuance of water reclamation requirements to a project which violates only a salinity standard in the basin plan."

And yet, the Regional Board (Region 5) will not allow reclamation to degrade underlying groundwater salinity concentrations. Reclamation will always degrade groundwater if the wastewater is of poorer quality than the water resource historically used to irrigate the site such as park, golf course, and farm land.

City of Dixon

600 East A Street • Dixon, California • 95620-3697
(707) 678-7000 • FAX (707) 678-0960 • TDD (707) 678-1489

The Water Code Section 60310(e)(2) states:

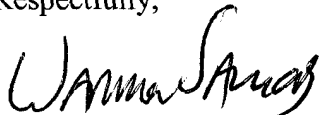
“Spray, mist, or runoff shall not enter dwellings, designated outdoor eating areas, or food handling facilities.”

And yet, the Department of Health Services will not define “mist.” The air pollution engineering science definition of “mist” is particles smaller than 10 microns. These particles reportedly can remain suspended in air for extended periods of time such that they would enter dwellings near parks and golf courses irrigated with wastewater, contrary to section 60310(e)(2). The City can not implement any spray irrigation reclamation project until the State defines a “mist” in the context of the Water Code.

In summary, the City believes water conservation and wastewater reclamation are key aspects of the State’s water future, yet current State agency actions and inactions do not encourage water conservation and reclamation. The “Investment Guide” recognizes these resource management strategies and assigns implementation costs to them. It is not clear, however, if the State is planning to make the “investment” in modifying and/or clarifying California water laws and policies, as well as educating the regulatory personnel, to appreciate and promote water conservation and wastewater reclamation as community assets rather than community liabilities.

The City has additional information and data we would like to discuss at a mutually agreeable time.

Respectfully,

A handwritten signature in black ink, appearing to read "Warren Salmons".

Warren Salmons
City Manager

CC: RWQCB
Rich Stowell, ECO:Logic
Dave Melilli, Public Works Director
Ron Tribbett, City Engineer